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November 13, 2006

VIA ELECTRONIC FILING

The Honorable Joseph J. Farnan, Jr.
United States District Court
For the District of Delaware
844 North King Street
Wilmington, Delaware 19801

Re: Secureworks, Inc. v. Secure Networx Corp., C.A. 05-538-JJF

Dear Judge Farnan:

Along with co-counsel at King & Spalding LLP, we represent Plaintiff, SecureWorks, Inc., in the above-referenced action. This letter is to update the Court about its status.

In August, Plaintiff filed a Motion for Contempt, Sanctions, and to Enforce the Judgment on Consent. On September 30, the Court ordered Defendant, Secure Networx Corp., to obtain counsel to enter an appearance for Defendant by October 27 and for the parties to provide a status update by November 3. On October 27, counsel for Secure Networx entered an appearance and filed a response to Plaintiff's Motion. During this time, the parties had been discussing possible resolutions to Plaintiff's Motion, and, in accordance with the Court's order submitted a status report explaining that the parties were attempting to reach a compromise and requesting until November 10 for Plaintiff to file its reply if necessary.

On Thursday, November 9, the parties reached agreement on an appropriate resolution to Plaintiff's Motion. Accordingly, Defendant's counsel advised Plaintiff's counsel that Defendant would execute the settlement agreement and consent judgment reflecting the agreed-upon terms, which would be sent directly to co-counsel at King & Spalding.

At this time, Plaintiff's counsel has not received signed copies of either the agreement or the Judgment. Although Plaintiff's counsel expects to receive them in due course, Plaintiff cannot file the consent judgment or withdraw its Motion until it has received the signed papers. Upon receipt of the signed papers, Plaintiff will file the consent judgment with the Court and withdraw its Motion for Contempt. Accordingly, Plaintiff respectfully requests that the Court withhold ruling on Plaintiff's Motion until such time as Plaintiff receives the signed agreement

The Honorable Joseph J. Farnan, Jr.

November 13, 2006

Page 2

and judgment papers from Defendant and files the consent judgment with the Court. In the event that the Defendant fails to execute the agreement and judgment, Plaintiff will immediately advise the Court.

Respectfully,

/s/ Richard L. Horwitz

Richard L. Horwitz

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cc: Clerk of the Court (via Hand Delivery)
Michael Arrington (via ECF)